EXHIBIT D



II:S. Department of Housing and Urtxus Development
Office of Inspector General
451 7° St., SW
Washington, DC 20410

Mr. Matthew Colangelo MAY 3 1 2007 NAACP Legal Defense and Educational Fund, Inc. 1444 Eye Street, N.W., 10th Floor Washington, DC 20005

FOIA Number: FIIG463733

Dear Mr. Colangelo:

You made a request under the Freedom of Information Act (FOIA), dated March 19, 2007, to the U.S. Department of Housing and Urban (HUD). You requested records pertaining to the CDBG Disaster Recovery Grants. One of your requests was forwarded to the Office of Inspector General (OIG). We responded to Item No. 3, which requested:

All records relating to any studies conducted by the HUD Office of the Inspector General regarding HUD's administration of, or any state grantee's administration of, the CDBG Disaster Recovery Grant program.

Although you requested "studies," we interpreted this to mean "audits." By a cover letter dated April 30, 2007, we provided you with four reports at no cost:

1) Memorandum No. 2007-AO-0001-CM, Evaluation of HUD's Procedures and Controls for the Katrina Disaster Housing Assistance Program and Disaster Voucher Program, Issued December 8, 2006; 2) Audit Report No. 2006-AO-1002, Cityside Management Corporation, Hammond, Louisiana, Did Not Enforce The Lease Terms Over Payment of Property Utilities, issued August 31, 2006; 3) Audit Report No. 2006-AT-0001, The Procurement Office Did Not Maintain Complete Contract Files, issued August 29, 2006; and 4) Audit Report No. 2006-AO-1001, Southwest Alliance of Asset Managers, LLC, Addison, Texas; Did Not Effectively Enforce The Lease Terms Over Payment of Property Utilities, issued June 23, 2006.

On May 22, 2007, Lara K. Eshkenazi, Assistant United States Attorney in the Southern District of New York, faxed this office a letter written to her by Melanca Clark, an attorney apparently representing you in litigation you have against HUD. In that letter, Ms. Clark tells Ms. Eshkenazi that three of the four audits we provided you did not address the CDBG Disaster Recovery Grant program, but instead dealt with different Katrina-related programs. It appears that the only audit in which you are interested is Audit Report No. 2006-AT-0001, The Procurement Office Did Not Maintain Complete Contract Files, Issued August 29, 2006. Ms. Clark also indicated that you wanted all the documents

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associated with that audit. She said she was willing to amend your request for documents to include only the states of Louisiana and MississIppi to help narrow the scope of any search. You should have contacted us directly if our response was inadequate. Regardless, we have decided to provide you with the work papers associated with this audit, subject to appropriate reductions.

Please note that the working papers associated with this audit are voluminous. These records will have to be retrieved, printed, and copied so they can be reviewed. Further, a search and line-by-line review of this material will consist of numerous hours of search and review time. For this reason, we are providing the enclosed four-page table of contents listing the documentary files associated with this audit report. Please keep in mind that there are other documents inside some of the documents showing in this table of contents which may consist of hundreds of pages of material. We ask you, if possible, to further refine or narrow your request by identifying the particular documents or areas you want us to review. Please let us know if you decide to designate certain records or if you want us to review this material in its entircty.

Each FOIA requester should be notified of certain costs incurred in processing their request. Please be advised that for this particular request, we are treating you as an "all other requesters" pursuant to the OIG's regulations for material released under the Freedom of Information Act. Under this category. 100 pages of reproduction and the first two hours of scarch time will be furnished without charge. You will be charged 18 cents per page for each page of copying after your 100 free pages and \$45.77 an hour of search time after the first two hours. There is no charge for costs less than \$25.00.

Your request for a fee walver or reduction has been denied.² We note that we provided you with the audit reports free of charge. You are now asking for the documentation associated with this audit. We do not believe release of these working papers will contribute significantly to the public understanding of the operations or activities of the Federal Government that is not already achieved through release of the audit report.

In addition, you have asked this office to expedite your request. This request is denied. You have failed to present a compelling need or the urgency for this material. There are two instances in which it is determined that a compelling need exists: (1) if the requester's failure to obtain the requested records on an expedited basis could reasonably be expected to pose an imminent threat to the life or physical safety of an individual or threatened loss of

¹ 24 C.F.R. §§ 2002.1 (referencing and incorporating 24 C.F.R. § 15.110 (72 Fed. Reg. 12542 (March 15, 2007)) and 2002.11.

² See 24 C.F.R. § 2002.11

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substantial due process rights; or (2) the requester is primarily engaged in disseminating information and there is an urgency to inform the public concerning actual or alleged Federal Government activity. Neither of these conditions appear applicable. We note that you were already provided with the audit report.

If you do decide to request all of the working papers associated with Audit Report No. 2006-AT-0001, or designate a voluminous amount, and a line-by-line review has to be conducted of each and every working paper, your request will be placed in a multitrack processing system. The OIG places requests in its simple or complex track based on the amount of work and time involved in processing a request. Your request will be placed in our complex track. The decision to place your request in this system is based on the amount of work and time involved in processing your request. Your request will be processed in the order in which it has been received within this track.⁴

Lastly, we inform you that, at this time, this audit is the only audit completed by OIG of the CDBG Disaster Recovery Grant program funds. There are currently a number of on-going audits that may be responsive to your request when completed. You will need to make a new request for these audits, or you may ask to be placed on our mailing list and access them through our electronic library at http://www.hud.gov/offices/oig/reports/subscription.cfm as they are released.

Please be advised that James A. Heist, Assistant Inspector General for Audit, Is the official responsible for this response. Should you have any questions concerning the FOIA request, please contact me at 202-708-1613.

Sincerely,

Darlene D. Hall

Freedom of Information Act

Officer

Enclosure

³ 24 C.F.R. § 2002.7. See also, 24 C.F.R. § 15.105).

⁴ ld.

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U.S. DEPARTMENT OF FOUSING AND URBAN DEVELOPMENT Office of Inspector General 451 7th St., S.W.
Washington, D.C. 20410

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